

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

MUKESH KUMAR, *et al.*,

*Plaintiffs,*

*v.*

BOCHASANWASI SHRI AKSHAR  
PURUSHOTTAM  
SWAMINARAYAN SANSTHA, INC.,  
*et al.*,

*Defendants.*

Civ. Action No.:  
21-CV-11048 (GC)(TJB)

**NOTICE OF MOTION TO LIFT STAY  
OR ALTERNATIVELY TO SEVER**

PLEASE TAKE NOTICE that upon Plaintiffs' Memorandum of Law, the September 12, 2025 Declaration of Patricia Kakalec and the exhibit thereto, and all other papers heretofore had in this matter, the undersigned counsel for Plaintiffs will move this Court, before the Honorable Georgette Castner, United States District Judge for the District of New Jersey, at the United States Courthouse, 402 East State Street Trenton, New Jersey 08608, on a date and time to be assigned by the Court, for an Order lifting the Trafficking Victim Protection Act ("TVPA") stay in this case to allowing the case to proceed. Alternatively, if the Court declines to lift the TVPA

stay, Plaintiffs seek an Order under Federal Rule of Civil Procedure 21 severing certain of Plaintiffs' claims and allowing those claims to separately proceed.

Responsive papers, if any, are due in accordance with Federal Rules of Civil Procedures and the Local Rules of the District of New Jersey.

Dated: Princeton, NJ  
September 12, 2025

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